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*Attorney for Defendants Mylan
Pharmaceuticals Inc., Mylan Laboratories
Limited, and Mylan Inc.*

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., SALIX
PHARMACEUTICALS, INC., PROGENICS
PHARMACEUTICALS, INC., and WYETH
LLC,

Plaintiffs

v.

MYLAN PHARMACEUTICALS INC., MYLAN
LABORATORIES LTD., MYLAN INC., and
ACTAVIS LLC,

Defendants.

C.A. No. 2:15-08180 (SRC) (CLW)
(consolidated)

Motion Date: May 7, 2018

**NOTICE OF DEFENDANTS' MOTION
IN LIMINE TO PRECLUDE
PLAINTIFFS FROM OFFERING
TESTIMONY FROM MICHAEL
TAGLIAFERI AND DR. ROBERT O.
WILLIAMS III IN CONNECTION
WITH THE PRIOR-ART STATUS OF
SHAH '115 OR RELISTOR® VIALS**

Oral Argument Requested

PLEASE TAKE NOTICE that on May 7, 2018, at a time to be set by the Court, or as soon as counsel may be heard, Defendants Mylan Pharmaceuticals Inc., Mylan Laboratories Ltd., Mylan Inc. (collectively, "Mylan"), and Actavis LLC ("Actavis") (Mylan and Actavis collectively, "Defendants"), by and through their undersigned counsel, will move before the Honorable Stanley R. Chesler, U.S.D.J., in the United States District Court for the District of

New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order precluding Plaintiffs Valeant Pharmaceuticals International, Inc., Salix Pharmaceuticals, Inc., Progenics Pharmaceuticals, Inc., and Wyeth LLC (collectively, “Plaintiffs”) from introducing or relying on testimony related to the prior art status of International Patent Application Publication No. WO 2008/019115 (“Shah ’115”) or Relistor® Vials from their corporate witness Michael Tagliaferi, their expert Dr. Robert O. Williams III, or any other witnesses who lack personal knowledge of the subject matter claimed and described in the Wyeth patents-in-suit (U.S. Patent Nos. 8,247,425, 8,420,663, 8,822,490 and 9,180,125) or the research and development of the methylnaltrexone injectable compositions described in Shah ’115 or contained in Relistor® Vials.

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, Defendants shall rely on the accompanying Brief and Declaration of Shaobo Zhu, Esq., as well as any other papers and pleadings on file in this matter.

PLEASE TAKE FURTHER NOTICE that if opposition to this Motion is presented, Defendants request oral argument on this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: March 28, 2018

Respectfully submitted,

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Respectfully submitted,

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